

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
)
PHILLIP RAY PREWITT, JR.) CASE NO. 18-08737-RLM-13
BOBBIE LEE PREWITT)
)
DEBTORS)

MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Come now the Debtors, Phillip Ray Prewitt, Jr. and Bobbie Lee Prewitt, by counsel, and move the court for modification of the Chapter 13 Plan post-confirmation.

In support of the motion, the Debtors state the following:

1. Debtors filed a case under Chapter 13 of the Bankruptcy Code on November 16, 2018.
2. A confirmed Chapter 13 Plan is currently in effect.
3. Debtors wish to correct the Plan's miscellaneous provisions.
4. Debtors are not modifying the plan payment terms. Debtors' current and proposed payment is \$600.00.
5. Should neither the Chapter 13 Trustee nor any other interested party object hereto, within the time allowed by law, Debtors urge the Court to grant the relief sought without necessity of a hearing.

WHEREFORE, the Debtors, by counsel, move the Court for an Order modifying the Chapter 13 Plan after confirmation as provided for in the Amended Chapter 13 Plan filed attached hereto and such other relief as appropriate.

PLEASE TAKE NOTICE THAT any objection must be filed with the Bankruptcy Clerk within **21 days** of the date of this notice [or such other time period as may be permitted by Fed.R. Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver

any objection by U.S. mail, courier, overnight/express mail, or in person at:

116 U.S. Courthouse
46 E. Ohio St.
Indianapolis, IN 46204

The objecting party must ensure delivery of the objection to the party filing the motion. **If an objection is NOT timely filed, the foregoing may be granted.**

By: /s/ Andrew Sawin
Sawin & Shea, LLC
Attorneys for Debtor
6100 N KEYSTONE AVE STE 620
INDIANAPOLIS IN 46220-2430
ecf@sawinlaw.com

CERTIFICATE OF SERVICE

I certify that a copy of the Motion was served on the following parties through the Court's Electronic Case Filing System or by first-class U.S. Mail, postage prepaid:

U.S. Trustee; Ch 13 Trustee

Indiana Department of Revenue
IN Government Center North
100 N. Senate, Rm N-240
Indianapolis, IN 46204

Hamilton's Bankruptcy Service, LLC
New World Collections (Franklin
Dental)
16462 E Lake Shore Dr. S
Hope, IN 47246

Eagle Finance Company
7311 US 31 S
Indianapolis, IN 46227

KeyBank N.A.
4910 Tiedeman Rd
Brooklyn, OH 44144

Americredit Financial Services, Inc.
Dba GM Financial
P.O Box 183853
Arlington, TX 76096

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Sprint Corp Attn Bankruptcy
PO Box 7949
Overland Park, KS 66207-0949

First Key Homes, LLC
1850 Parkway Place, Suite 900
Marietta, GA 30067

Portfolio Recovery Associates, LLC
POB 12914
Norfolk VA 23541

PERSONAL FINANCE CO
8211 TOWN CENTER DRIVE
NOTTINGHAM, MD 21236

Pinnacle Credit Services, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Financial Center First Credit Union
c/o Karl T. Ryan
6502 Westfield Blvd
Indianapolis, IN 46220

Financial Center FCU
7101 E. 56th St.
Indianapolis, IN 46226

July 7, 2020

/s/ Andrew Sawin

